

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GETTY IMAGES, INC., a Delaware
Corporation,

Plaintiff,

vs.

ROXANNE MOTAMEDI, an individual,

Defendant.

Case No. 2:16-cv-1892

DECLARATION OF TINA M. AIKEN IN
SUPPORT OF REPLY RE PLAINTIFF'S
MOTION FOR TEMPORARY
RESTRAINING ORDER

1. My name is Tina M. Aiken. I am an attorney representing plaintiff Getty Images, Inc. ("GETTY IMAGES"). I have personal knowledge of the following facts.

2. On January 5, 2017, Defendant Roxanne Motamedi ("Motamedi") delivered a partial document production to GETTY IMAGES' vendor. However, we were not able to begin reviewing the document production until January 6 due to the file size and the time required to load the documents into the database. Motamedi forwarded the remaining document production on January 6, which also required time to load into the database. The most significant documents produced by Motamedi were in the second production. In total, Motamedi produced over 25,000 documents comprising more than 80,000 pages.

3. Two documents that help highlight the activities of Motamedi and her husband, Mitchell Lucas, were produced as large multi-tab excel spreadsheets. Attached hereto as Exhibit 1 is an excerpt from the spreadsheet titled "Report – Roxanne iPhone 7 Decrypted_20161229.xlsx." Attached hereto as Exhibit 2 is an excerpt from the spreadsheet

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1 titled "Report - Mitchell iPad_20161229.xlsx." Key entries in both documents are surrounded
2 by a red box.

3 4. In the limited time I have had to assess the documents taken by Motamedi from
4 GETTY IMAGES, I have created folders and subfolders to organize those documents. Due to
5 the limited time and the large number of documents, my review is not yet complete. However,
6 based on my review thus far Motamedi began forwarding confidential GETTY IMAGES'
7 information and documents from her work email address,
8 Roxanne.Motamedi@gettyimages.com, to her personal email address, swissrox@gmail.com,
9 beginning in early June 2016. The emails and attachments Motamedi forwarded to her personal
10 email account are organized by date, and screenshots of the folders are attached hereto as Exhibit
11 3. Attached hereto as Exhibit 4 is a screenshot of selected emails and attachments of confidential
12 business and trade secret information that Motamedi forwarded to her personal email account.
13 Attached hereto as Exhibit 5 is a screenshot of selected emails and attachments of customer and
14 contributor contracts that Motamedi forwarded to her personal email account. These screenshots
15 help illustrate the magnitude of the volume of GETTY IMAGES' documents taken by
16 Motamedi.

17 5. Motamedi also forwarded a significant number of emails containing GETTY
18 IMAGES' confidential business information from her work email address,
19 Roxanne.Motamedi@gettyimages.com, to her husband's personal email address,
20 ml90049@gmail.com. Attached hereto as Exhibit 6 is a screen shot of folders containing the
21 emails and attachments Motamedi forwarded to her husband.


22 6. Motamedi also forwarded a significant number of emails containing GETTY
23 IMAGES' confidential business information from her work email address,
24 Roxanne.Motamedi@gettyimages.com, to the personal email address of Nick Evans-Lombe,
25 nevanslombe@gmail.com. Attached hereto as Exhibit 6 is a screen shot of folders containing the
26 emails and attachments Motamedi forwarded to Mr. Evans-Lombe.

8. Attached hereto as Exhibit 8 is a true and correct copy of Defendant's Supplemental Responses and Objections to Plaintiff's First Set of Interrogatories, with highlighting.

9. Attached hereto as Exhibit 9 is a true and correct copy of the Deposition of Roxanne Motamedi, taken pursuant to the Court's TRO Order on January 9, 2017, with highlighting.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 9th day of January, 2017, at Bellevue, Washington.


Tina M. Aiken, WSBA #27792